



California Fair Political Practices Commission

June 27, 1989

Art Pulaski, Executive Secretary
San Mateo County Central
Labor Council
300 Eighth Ave., Ste. 1
San Mateo, CA 94401

Re: Your Request for Advice
Our File No. A-89-329

Dear Mr. Pulaski:

You have requested confirmation of telephone advice provided to you concerning the campaign provisions of the Political Reform Act.^{1/}

Your letter correctly summarizes my advice that the San Mateo County Central Labor Council is not required to keep funds received in 1988 which are not in compliance with the provisions of Proposition 73 separate from non-complying funds received in 1989. Therefore, you may transfer the funds held by the San Mateo Labor Council, AFL-CIO, Administrative Fund (I.D. No. 890266) to the non-candidate account held by the San Mateo Labor Council, AFL-CIO Committee on Political Education (I.D. No. 743614), and terminate the administrative fund committee (No. 890266). A copy of your letter is enclosed for your convenience.

Please call me at (916) 322-5662 if you have additional questions.

Sincerely,

Kathryn E. Donovan
General Counsel

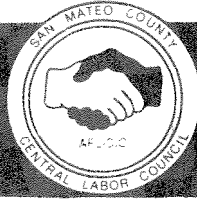
Carla Wardlow

By: Carla Wardlow
Assistant Chief, Technical
Assistance & Analysis Division

Enclosure

^{1/}Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

San Mateo County
Central Labor Council



300 Eighth Avenue, Suite 1
San Mateo, California 94401
(415) 340-0418

AFL-CIO

May 26, 1989

Carla Wardlow
FPPC
Box 807
Sacramento, CA 95814

FPPC
MAY 30 1989

Dear Ms. Wardlow:

Based on our conversation May 24th, I am writing to request confirmation that action we are considering complies with Propositions 68 and 73.

Since January of this year, we have reorganized our Committee on Political Education by filing for a broad based Committee, and at the same time organized a second Committee under the name of "Administrative Fund".

Accordingly, we now have two committees: first, is our broad-based committee, with two accounts; one for complying funds, and the other for non-complying funds from 1988. The name is **SAN MATEO LABOR COUNCIL, AFL-CIO, COMMITTEE ON POLITICAL EDUCATION (I.D. 743-614).**

Our second Committee is for non-complying (Administrative-only) funds received **after** January 1, 1989. It's name is **SAN MATEO LABOR COUNCIL, AFL-CIO, Administrative Fund (I.D. 890-266).**

You advised that we do not need a second committee, and that we could consolidate non-complying funds from 1988 and 1989 under our single broad-based committee. In other words, our broad-based committee could contain two accounts, segregating our complying funds into one account and our non-candidate (Overhead) funds from both 1988 and 1989 into the second account.

We would, therefore, terminate our second Political Action Committee, originally created because we believed we could not mingle "non-candidate" funds from 1988 with those of 1989.

Please confirm that we are doing the right thing in following the outlined procedure. Thank you.

Very truly yours,

ART PULASKI
Executive Secretary



California Fair Political Practices Commission

June 1, 1989

Art Pulask
Central Labor Council
300 Eighth Avenue, Suite 1
San Mateo, CA 94401

Re: Letter No. 89-329

Dear Mr. Pulask:

Your letter requesting advice under the Political Reform Act was received on May 30, 1989 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

Jeanne Pritchard by SH
Jeanne Pritchard
Chief Technical Assistance
and Analysis Division

JP:plh